

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION, *et al.*,

Defendants.

Case No. 1:25-cv-02990 (ER)(BCM)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and supporting declarations, Plaintiffs the State of New York, the State of Arizona, the State of California, the State of Delaware, the District of Columbia, the State of Hawai‘i, the State of Illinois, the State of Maine, the State of Maryland, the Commonwealth of Massachusetts, the People of the State of Michigan, the State of Minnesota, the State of Nevada, the State of New Jersey, the State of New Mexico, the State of Oregon, and Josh Shapiro, in his official capacity as Governor of the Commonwealth of Pennsylvania, will move this Court before the Honorable Edgardo Ramos, United States District Judge, at the Thurgood Marshall United States Courthouse for the Southern District of New York, 40 Foley Square, New York, NY 10007, on a date set by the Court, for an order pursuant to Federal Rule of Civil Procedure 65(a) granting their motion for a preliminary injunction against Defendants United States Department of Education and Linda McMahon, sued in her official capacity as Secretary of the United States Department of Education, and such other and further relief as the Court deems necessary and appropriate.

Dated: New York, New York
April 11, 2025

LETITIA JAMES

ATTORNEY GENERAL OF NEW YORK

By: /s Andrew Amer

Andrew Amer

Special Counsel

Molly Thomas-Jensen

Special Counsel

Rabia Muqaddam

*Special Counsel for Federal
Initiatives*

Stephen C. Thompson

Assistant Attorney General

28 Liberty Street

New York, NY 10005

(212) 416-6127

andrew.amer@ag.ny.gov

Counsel for the State of New York

cc: All Counsel of Record (via ECF)